

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

SHANIKA K. BOYD,)	
)	
Plaintiff,)	
)	
v.)	Civil Action No. 3:12-cv-00830
)	
EQUIFAX INFORMATION SERVICES, LLC, et al.)	
)	
Defendants.)	

**DEFENDANT PROFESSIONAL ACCOUNT MANAGEMENT, LLC'S ANSWER AND
AFFIRMATIVE DEFENSES TO PLAINTIFF'S COMPLAINT**

Defendant, Professional Account Management, LLC, ("PAM"), by its undersigned counsel, for its answer to plaintiff's complaint, states as follows:

PRELIMINARY STATEMENT

PAM admits that plaintiff's complaint purports to bring this lawsuit under the Fair Credit Reporting Act ("FCRA") 15 U.S.C. § 1681 *et seq.* and seeks damages, costs and fees. PAM denies violating the FCRA or any other laws, denies plaintiff is entitled to damages, costs or fees and denies any remaining allegations contained within the preliminary statement.

JURISDICTION

1. In response to paragraph 1 of the complaint, PAM admits that plaintiff's complaint purports to allege jurisdiction pursuant to 15 U.S.C. § 1681(p) and 28 U.S.C. § 1331 thereby invoking the subject matter jurisdiction of this Court. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 1 of plaintiff's complaint.

2. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 2 of plaintiff's complaint.

3. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 3 of plaintiff's complaint.

4. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of plaintiff's complaint.

5. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 5 of plaintiff's complaint.

6. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 6 of plaintiff's complaint.

7. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 7 of plaintiff's complaint.

8. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of plaintiff's complaint.

9. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 9 of plaintiff's complaint.

10. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 10 of plaintiff's complaint.

11. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 11 of plaintiff's complaint.

12. In response to paragraph 12 of the complaint, PAM admits that it is a Wisconsin LLC with headquarters in Milwaukee, Wisconsin, and is registered in the Commonwealth of

Virginia and maintains a service agent. PAM denies that it is a debt collector as governed by the FCRA. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 12 of plaintiff's complaint.

13. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of plaintiff's complaint.

14. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 14 of plaintiff's complaint.

15. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 15 of plaintiff's complaint.

16. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 16 of plaintiff's complaint.

FACTS

17. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 17 of plaintiff's complaint.

18. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 18 of plaintiff's complaint.

19. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 19 of plaintiff's complaint.

20. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 20 of plaintiff's complaint.

21. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 21 of plaintiff's complaint.

22. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 22 of plaintiff's complaint.

23. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 23 of plaintiff's complaint.

24. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 24 of plaintiff's complaint.

25. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 25 of plaintiff's complaint.

26. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 26 of plaintiff's complaint.

27. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of plaintiff's complaint.

28. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 28 of plaintiff's complaint.

29. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 29 of plaintiff's complaint.

30. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 30 of plaintiff's complaint.

31. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 31 of plaintiff's complaint.

32. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 32 of plaintiff's complaint.

33. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 33 of plaintiff's complaint.

34. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 34 of plaintiff's complaint.

35. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 35 of plaintiff's complaint.

36. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 36 of plaintiff's complaint.

37. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 37 of plaintiff's complaint.

38. In response to paragraph 38 of the complaint, PAM denies providing any inaccurate verification and denies failing to properly investigate any dispute. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 38 of plaintiff's complaint.

39. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 39 of plaintiff's complaint.

40. In response to paragraph 40 of the complaint, PAM denies any false reporting. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 40 of plaintiff's complaint.

41. In response to paragraph 41 of the complaint, PAM denies ignoring any disputes and denies refusing to delete any inaccurate information. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 41 of plaintiff's complaint.

42. In response to paragraph 42 of the complaint, PAM denies knowledge of any inaccuracies and denies deliberately choosing to ignore and permit reporting of information. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 42 of plaintiff's complaint.

43. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 43 of plaintiff's complaint.

COUNT ONE: VIOLATION OF FAIR CREDIT REPORTING ACT

15 U.S.C. § 1681b(f)

(RJM, TRIDENT AND CAVALRY)

44. PAM restates and realleges its responses to paragraphs 1-43 of the complaint.

45. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 45 of plaintiff's complaint.

46. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 46 of plaintiff's complaint.

47. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 47 of plaintiff's complaint.

48. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 48 of plaintiff's complaint.

COUNT TWO: VIOLATION OF FAIR CREDIT REPORTING ACT
15 U.S.C. §1681b
(*EQUIFAX, EXPERIAN and TRANS UNION*)

49. PAM restates and realleges its responses to paragraphs 1-48 of the complaint.

50. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 50 of plaintiff's complaint.

51. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 51 of plaintiff's complaint.

52. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 52 of plaintiff's complaint.

53. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 53 of plaintiff's complaint.

COUNT THREE: VIOLATION OF FAIR CREDIT REPORTING ACT
15 U.S.C. §1681e(a)
(*EQUIFAX, EXPERIAN and TRANS UNION*)

54. PAM restates and realleges its responses to paragraphs 1-53 of the complaint.

55. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 55 of plaintiff's complaint.

56. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 56 of plaintiff's complaint.

57. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 57 of plaintiff's complaint.

58. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 58 of plaintiff's complaint.

**COUNT FOUR: VIOLATION OF FAIR CREDIT REPORTING ACT 15 U.S.C. §
1681e(b)
(*EQUIFAX, EXPERIAN and TRANS UNION*)**

59. PAM restates and realleges its responses to paragraphs 1-58 of the complaint.

60. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 60 of plaintiff's complaint.

61. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 61 of plaintiff's complaint.

62. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 62 of plaintiff's complaint.

63. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 63 of plaintiff's complaint.

COUNT FIVE: VIOLATION OF FAIR CREDIT REPORTING ACT
15 U.S.C. § 1681i(a)(1)
(EQUIFAX, EXPERIAN, TRANS UNION)

64. PAM restates and realleges its responses to paragraphs 1-63 of the complaint.

65. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 65 of plaintiff's complaint.

66. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 66 of plaintiff's complaint.

67. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 67 of plaintiff's complaint.

68. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 68 of plaintiff's complaint.

COUNT SIX: VIOLATION OF FAIR CREDIT REPORTING ACT.
15 U.S.C. § 1681i(a)(2)(A)
(EQUIFAX, EXPERIAN AND TRANS UNION)

69. PAM restates and realleges its responses to paragraphs 1-68 of the complaint.

70. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 70 of plaintiff's complaint.

71. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 71 of plaintiff's complaint.

72. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 72 of plaintiff's complaint.

73. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 73 of plaintiff's complaint.

COUNT SEVEN: VIOLATION OF FAIR CREDIT REPORTING ACT
15 U.S.C. § 1681i(a)(4)
(EQUIFAX, EXPERIAN AND TRANS UNION)

74. PAM restates and realleges its responses to paragraphs 1-73 of the complaint.

75. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 75 of plaintiff's complaint.

76. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 76 of plaintiff's complaint.

77. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 77 of plaintiff's complaint.

78. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 78 of plaintiff's complaint.

COUNT EIGHT: VIOLATION OF FAIR CREDIT REPORTING ACT
15 U.S.C. § 1681i(a)(5)(A)
(EQUIFAX, EXPERIAN AND TRANS UNION)

79. PAM restates and realleges its responses to paragraphs 1-78 of the complaint.

80. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 80 of plaintiff's complaint.

81. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 81 of plaintiff's complaint.

82. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 82 of plaintiff's complaint.

83. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 83 of plaintiff's complaint.

COUNT NINE: VIOLATION OF FAIR CREDIT REPORTING ACT
15 U.S.C. § 1681s-2(b)(1)(A)
(DCSE, RJM, TRIDENT, PRO ACCOUNT MANAGEMENT, CREDIT COLLECTION)

84. PAM restates and realleges its responses to paragraphs 1-83 of the complaint.

85. In response to paragraph 85 of the complaint, PAM denies all allegations asserted against it. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 85 of plaintiff's complaint.

86. In response to paragraph 86 of the complaint, PAM admits that it uses the "e-Oscar" system. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 86 of plaintiff's complaint.

87. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 87 of plaintiff's complaint.

88. In response to paragraph 88 of the complaint, PAM admits that it uses the “ACDV” form. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 88 of plaintiff’s complaint.

89. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 89 of plaintiff’s complaint.

90. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 90 of plaintiff’s complaint.

91. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 91 of plaintiff’s complaint.

92. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 92 of plaintiff’s complaint.

93. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 93 of plaintiff’s complaint.

94. In response to paragraph 94 of the complaint, PAM denies following any unlawful process. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 94 of plaintiff’s complaint.

95. In response to paragraph 95 of the complaint, PAM denies failing to conduct proper reviews where required. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 95 of plaintiff’s complaint.

96. PAM denies all allegations contained within paragraph 96 of the complaint.

97. PAM denies all allegations contained within paragraph 97 of the complaint.

98. PAM denies all allegations contained within paragraph 98 of the complaint.

99. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 99 of plaintiff's complaint.

100. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 100 of plaintiff's complaint.

101. In response to paragraph 101 of the complaint, PAM denies any mistakes known at this time. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 101 of plaintiff's complaint.

102. In response to paragraph 102, PAM denies any failures have been alleged. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 102 of plaintiff's complaint.

103. PAM denies all allegations contained within paragraph 103 of the complaint.

104. PAM denies all allegations contained within paragraph 104 of the complaint.

COUNT TEN: VIOLATION OF FAIR CREDIT REPORTING ACT
15 U.S.C. § 1681s-2(b)(1)(B)
(DCSE, RJM, TRIDENT, PRO ACCOUNT MANAGEMENT, CREDIT COLLECTION)

105. PAM restates and realleges its responses to paragraphs 1-104 of the complaint.

106. In response to paragraph 106 of the complaint, PAM denies all allegations asserted against it. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 106 of plaintiff's complaint.

107. In response to paragraph 107 of the complaint, PAM admits that it uses the "e-Oscar" system. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 107 of plaintiff's complaint.

108. In response to paragraph 108 of the complaint, PAM admits that it is aware that the "e-Oscar" system uses dispute codes. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 108 of plaintiff's complaint.

109. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 109 of plaintiff's complaint.

110. PAM lacks knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 110 of plaintiff's complaint.

111. In response to paragraph 111 of the complaint, PAM denies all allegations asserted against it. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 111 of plaintiff's complaint.

112. PAM denies all allegations contained within paragraph 112 of the complaint.

113. PAM denies all allegations contained within paragraph 113 of the complaint.

114. PAM denies all allegations contained within paragraph 114 of the complaint.

COUNT ELEVEN: VIOLATION OF FAIR CREDIT REPORTING ACT
15 U.S.C. § 1681s-2(b)(1)(C) and (D)
(DCSE, PRO ACCOUNT MANAGEMENT, RJM, CREDIT COLLECTION AND TRIDENT)

115. PAM restates and realleges its responses to paragraphs 1-114 of the complaint.

116. In response to paragraph 116 of the complaint, PAM denies all allegations asserted against it. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 116 of plaintiff's complaint.

117. In response to paragraph 117 of the complaint, PAM denies all allegations asserted against it. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 117 of plaintiff's complaint.

118. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 118 of plaintiff's complaint.

119. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 119 of plaintiff's complaint.

120. In response to paragraph 120 of the complaint, PAM denies all allegations asserted against it. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 120 of plaintiff's complaint.

121. PAM denies all allegations contained within paragraph 121 of the complaint.

122. PAM denies all allegations contained within paragraph 122 of the complaint.

123. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 123 of plaintiff's complaint.

124. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 124 of plaintiff's complaint.

125. In response to paragraph 125 of the complaint, PAM denies any mistakes known at this time. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 125 of plaintiff's complaint.

126. In response to paragraph 126, PAM denies any failures have been alleged. PAM lacks knowledge or information sufficient to form a belief as to the truth of the remaining allegations contained in paragraph 126 of plaintiff's complaint.

127. PAM denies all allegations contained within paragraph 127 of the complaint.

128. PAM denies all allegations contained within paragraph 128 of the complaint.

Defendant, Professional Account Management, LLC, ("PAM"), by its undersigned counsel, for its affirmative defenses to plaintiff's complaint, states as follows:

FIRST AFFIRMATIVE DEFENSE

For its first affirmative defense, PAM alleges that plaintiff's complaint fails to state a claim against PAM upon which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

For its second affirmative defense, PAM alleges that, due to the operation of a final order, judgment or adjudication against plaintiff in District of Columbia matter M005593341, the claims against it in this case are barred in part, or in whole, by the *Rooker-Feldman* doctrine.

Rooper v. Fidelity Trust Co., 263 U.S. 413 (1923), and *District of Columbia Court of Appeals v. Feldman*, 460 U.S. 462 (1983).

THIRD AFFIRMATIVE DEFENSE

For its third affirmative defense, PAM alleges that, due to the operation of a final order, judgment or adjudication against plaintiff in District of Columbia matter M005593341, the claims in this case against it are barred in part, or in whole, by the doctrines of res judicata and/or collateral estoppel.

FOURTH AFFIRMATIVE DEFENSE

For its fourth affirmative defense, PAM alleges that, due to plaintiff's admission of liability in District of Columbia matter M005593341, the claims in this case against it are barred in part, or in whole, on the basis of waiver.

FIFTH AFFIRMATIVE DEFENSE

For its fifth affirmative defense, PAM alleges that, that any violation of the FCRA, which PAM denies occurred, was not intentional and PAM maintained procedures designed to avoid and prevent errors which might slip through procedures aimed at good faith compliance.

WHEREFORE Defendant Professional Account Management, LLC respectfully requests that the Court enter Judgment in its favor and grant it such other relief as the Court deems appropriate.

TRIAL BY JURY DEMANDED on all issues so triable.

Dated: February 15, 2013

Respectfully submitted,

Professional Account Management, LLC

By: /s/

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CERTIFICATE OF SERVICE

I hereby certify that on the 15th day of February 2013, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

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